



## U.S. Department of Justice

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June 22, 2021

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Re: *United States v. Joseph Liberto*  
Criminal No. RDB-19-0600  
Discovery Production 6

Dear Counsel:

Pursuant to the discovery agreement in the above-captioned case, the accompanying production consists of pdf documents with a bates range of USA-019246 - 019639, which have been uploaded to USAFx. Please note that all but 22 pages of this production were previously produced in the February 4, 2020 (PROD 1) or March 23, 2020 (PROD 2) productions.

As we have discussed, during the course of our recent pre-trial preparation, we decided to double-check to verify that every document in the Sierra Construction job files related to the indictment counts (which were kept in our office here) had previously been produced. We further determined that the job files relating to the charged counts should be rescanned in color, and the manila job file folders should be rescanned if the previously produced versions were missing the job file number or any text or notations, particularly on the inside of the folder.

As set forth the table below, our review identified 22 pages that had not previously been produced (copies of these pages are attached). These relate to 11 of the 31 substantive counts: numbers 3, 8, 9-10, 12, 14, 16, 22, 23, 25, and 28. In the table below, we have also identified any duplicate items from the previous productions that we have removed.

Count	PROD_BEGDOC	PROD_ENDDOC	Previous Bates Range / Production	NOTES
Count 02 # 32731406	USA-019246	USA-019258	USA-016479 – 016491 / PROD 1 USA-017901 – 017913 / PROD 2	• Nothing new
Count 03 # 35277735	USA-019259	USA-019268	USA-016492 – 016503 / PROD 1 USA-018043 – 018055 / PROD 2	• New page 9 of 10
Count 04 # 32777738	USA-019269	USA-019282	USA-016504 – 016516 / PROD 1 USA-018063 – 018075 / PROD 2	• Nothing new, except folder scan

Count 05 # 32900277	USA-019283	USA-019294	USA-016517 – 016521 / PROD 1 USA-018076 – 018090 / PROD 2	<ul style="list-style-type: none"> <li>• Previous production had three duplicated images (18077 – 18079)</li> </ul>
Count 06 # 32898671	USA-019295	USA-019308	USA-016522 – 016527 / PROD 1 USA-018091 – 018104 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new, just better folder image</li> <li>• With Color</li> </ul>
Count 07 # 32978774	USA-019309	USA-019320	USA-016528 – 016539 / PROD 1 USA-018105 – 018116 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new, except folder scan</li> </ul>
Count 08 # 33305631	USA-019321	USA-019334	USA-016540 – 016548 / PROD 1 USA-018117 – 018126 / PROD 2	<ul style="list-style-type: none"> <li>• New pages 11-14 of 14</li> </ul>
Count 09 # 33609075	USA-019335	USA-019346	USA-016549 – 016559 / PROD 1 USA-018127 – 018137 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new except inside folder cover, page 2 of 12</li> </ul>
Count 10 # 33590713	USA-019347	USA-019357	USA-016560 – 016568 / PROD 1 USA-017804 – 017813 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new except inside folder cover, page 2 of 11</li> </ul>
Count 11 # 33508495	USA-019358	USA-019374	USA-016569 – 016581 / PROD 1 USA-017814 – 017829 / PROD 2	<ul style="list-style-type: none"> <li>• USA-017829 is a duplicate of page 6 of 16</li> <li>• New Scan has better folder image, including inside folder</li> </ul>
Count 12 # 33438136 & 33438138	USA-019375	USA-019397	USA-016592 – 016600 / PROD 1 USA-017830 – 017839 / PROD 2	<ul style="list-style-type: none"> <li>• New pages 11-13 of 23</li> <li>• New page 17 of 23</li> </ul>
Count 13 # 33711551	USA-019398	USA-019407	USA-016601 – 016610 / PROD 1 USA-017840 – 017849 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new, except folder scan</li> </ul>
Count 14 # 33638612	USA-019408	USA-019418	USA-016611 – 016619 / PROD 1 USA-017850 – 017859 / PROD 2	<ul style="list-style-type: none"> <li>• USA-017856 is duplicate of page 2 of 10</li> <li>• New pages 10 and 11 of 11</li> </ul>
Count 15 # 33939106	USA-019419	USA-019433	USA-016620 – 016631 / PROD 1 USA-017860 – 017874 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new, except folder scan</li> </ul>
Count 16 # 33898240	USA-019434	USA-019442	USA-016632 – 016636 / PROD 1 USA-017875 – 017882 / PROD 2	<ul style="list-style-type: none"> <li>• New page 9 of 9</li> </ul>
Count 17 # 35075963	USA-019443	USA-019451	USA-016637 – 016645 / PROD 1 USA-017883 – 017891 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new, just in color</li> </ul>
Count 18 # 35078304	USA-019452	USA-019460	USA-016646 – 016654 / PROD 1 USA-018138 – 018146 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new</li> </ul>
Count 19 # 35177568	USA-019461	USA-019469	USA-016655 – 016663 / PROD 1 USA-017892 – 017900 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new, just in color</li> </ul>
Count 20 # 35080237	USA-019470	USA-019478	USA-016664 – 016672 / PROD 1 USA-017914 – 017922 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new, just in color</li> </ul>
Count 21 # 35262800	USA-019479	USA-019488	USA-016673 – 016682 / PROD 1 USA-017923 – 017932 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new, just in color</li> </ul>
Count 22 # 35036031	USA-019489	USA-019505	USA-016683 – 016692 / PROD 1 USA-017933 – 017948 / PROD 2	<ul style="list-style-type: none"> <li>• Inside folder cover new, page 2</li> </ul>
Count 23 # 35381594	USA-019506	USA-019522	USA-016693 – 016705 / PROD 1 USA-017949 – 017961 / PROD 2	<ul style="list-style-type: none"> <li>• Inside folder new, page 2</li> </ul>

				<ul style="list-style-type: none"> <li>• New pages 15-17 of 17</li> <li>• In color</li> </ul>
Count 24 # 35469809	USA-019523	USA-019530	USA-016706 – 016713 / PROD 1 USA-017962 – 017978 / PROD 2	<ul style="list-style-type: none"> <li>• Previous produced file contained documents that were not a part of original file</li> </ul>
Count 25 # 35381257	USA-019531	USA-019544	USA-016714 – 016721 / PROD 1 USA-017979 – 017992 / PROD 2	<ul style="list-style-type: none"> <li>• Previous file contained duplicate image, page 4</li> <li>• New page 12 of 14</li> </ul>
Count 26 # 35775539	USA-019545	USA-019553	USA-016722 – 016727 / PROD 1 USA-017993 – 018001 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new</li> </ul>
Count 27 # 35817347	USA-019554	USA-019572	USA-016728 – 016738 / PROD 1 USA-018002 – 018015 / PROD 2	<ul style="list-style-type: none"> <li>• Better scan of folder</li> <li>• New scan contains the same three photos again at end of file</li> </ul>
Count 28 # 35469754	USA-019573	USA-019590	USA-016739 – 016744 / PROD 1 USA-018016 – 018031 / PROD 2	<ul style="list-style-type: none"> <li>• Better scan of folder</li> <li>• New scans of inside folder, page 2-3 of 18</li> </ul>
Count 29 # 35878242	USA-019591	USA-019602	USA-016745 – 016750 / PROD 1 USA-018032 – 018042 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new, except folder scan</li> </ul>
Count 30 # 35982676	USA-019603	USA-019609	USA-016751 – 016757 / PROD 1 USA-018056 – 018062 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new, except folder scan</li> </ul>
Count 31 # 35982503	USA-019610	USA-019628	USA-016767 – 016780 / PROD 1 USA-018153 – 018183 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new, except folder scan</li> </ul>
Count 32 # 36107067	USA-019629	USA-019639	USA-017793 – 017803 / PROD 2	<ul style="list-style-type: none"> <li>• Nothing new</li> </ul>

*Note that the foregoing materials are of a private nature containing personal information which the government and all parties have a responsibility to protect from unneeded disclosure. Consequently, the foregoing materials are being provided to you on the condition that they not to be copied, except for use by counsel, and that no copy will be provided to any defendant or to anyone outside counsel's office, absent prior approval by the government. (As previously agreed upon, defense counsel may provide copies of these to their client so that he can review them as his residence.)*

Please do not hesitate to contact us if you have any questions.

Very truly yours,

Jonathan Lenzner  
Acting United States Attorney

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/s/  
Jefferson M. Gray  
Assistant United States Attorney